

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
**FREEDOM LAW FIRM, LLC**  
8985 South Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Phone: (702) 880-5554  
FAX: (702) 385-5518  
Email: info@freedomlegalteam.com

Michael Kind, Esq.  
Nevada Bar No.: 13903  
**KIND LAW**  
8860 South Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123  
(702) 337-2322  
(702) 329-5881 (fax)  
mk@kindlaw.com  
*Attorney for Plaintiff Arsenio Aguilar*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Arsenio Aguilar,

Plaintiff,

v.

Equifax Information Services LLC et  
al,

Defendants.

Case No.: 2:21-cv-01752-GMN-NJK

**Stipulated Discovery Plan and  
Scheduling Order Submitted in  
Compliance with LR 26-1(b)**

Arsenio Aguilar, Equifax Information Services LLC, and Nationstar Mortgage, LLC (jointly as the “parties”), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order.

## PROPOSED DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

- |   |              |
|---|--------------|
| 1. Initial disclosures .....            | Dec 27, 2021 |
| 2. Amend pleadings and add parties ..   | Jan 26, 2022 |
| 3. Expert disclosures (initial): .....  | Feb 25, 2022 |
| 4. Expert disclosures (rebuttal): ..... | Mar 28, 2022 |
| 5. Discovery cutoff date: .....         | Apr 27, 2022 |
| 6. Dispositive motions: .....           | May 27, 2022 |
| 7. Pretrial order .....                 | Jun 27, 2022 |

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

Protective Order: The parties may seek to enter a stipulated protective order pursuant to Rule 26(c) prior to producing any confidential documents.

Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be served by sending such documents by email.

Alternative Dispute Resolution Certification: The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and early neutral evaluation. The parties have not reached any stipulations at this stage.

Alternative Forms of Case Disposition Certification: The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01). The parties have not reached any stipulations at this stage.

Electronically Stored Information: The parties have discussed the retention and production of electronic data. The parties agree that service of discovery by electronic means, including sending original electronic files by email or on a cd is sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

///

///

///

1        Electronic evidence conference certification: The parties further intend to  
 2 present evidence in electronic format to jurors for the purposes of jury deliberations  
 3 at trial. The parties discussed the presentation of evidence for juror deliberations but  
 did not reach any stipulations as to the method as this early stage.

4        Dated: December 9, 2021.

5        **KIND LAW**

6        /s/ Michael Kind  
 7 Michael Kind, Esq.  
 8 8860 South Maryland Parkway, Suite 106  
 9 Las Vegas, Nevada 89123

10       **FREEDOM LAW FIRM**

11       /s/ Gerardo Avalos  
 12 George Haines  
 13 Gerardo Avalos, Esq.  
 14 8985 South Eastern Ave., Suite 350  
 Las Vegas, NV 89123  
*Counsel for Plaintiff*

15       **KRAVITZ, SCHNITZER JOHNSON WATSON & ZEPPENFELD, CHTD.**

16       /s/ Gary Schnitzer  
 17 Gary E. Schnitzer, Esq.  
 18 811 South Sixth Street  
 19 Las Vegas, Nevada 89101  
*Counsel for Defendant Nationstar Mortgage, LLC*

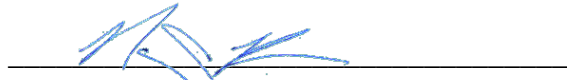
20       **CLARK HILL PLLC**

21       /s/ Gia Marina  
 22 Gia N. Marina, Esq.  
 23 3800 Howard Hughes Pkwy, Suite 500  
 24 Las Vegas, NV 89169  
 25 *Counsel for Defendant Equifax Information Services LLC*  
 26  
 27

## SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: December 10, 2021